

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts
Southern District of Texas
FILED

June 28, 2022

Nathan Ochsner, Clerk of Court

United States of America

v.

Martha Ramirez Lopez (2003/United States)
Rose Etienne Ortiz (2001/United States)
Brandon Vicente Delgado Puente (1999/MX)

Case No. 7:22-mj-1254

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 27, 2022 in the county of Cameron in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

21 USC § 841

Possession with intent to distribute approximately 4.17 kilograms of cocaine,
a Schedule II controlled substance

21 USC § 846

Conspiracy to possess with intent to distribute approximately 4.17 kilograms
of cocaine, a Schedule II controlled substance

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Peter Brostowin

Submitted by reliable electronic means, sworn to
and attested to telephonically per Fed. R. Cr. 4.1,
and probable cause found on:Date: June 28, 2022 at 7:10 a.m.City and state: McAllen, Texas

/s/ Juan Varela

Complainant's signature

Juan Varela, HSI Special Agent

Printed name and title

Judge's signature

Hon. J. Scott Hacker, U.S. Magistrate

Printed name and title

Attachment "A"

I, Juan Manuel Varela Jr., am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

1. On June 27, 2022, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection Office of Field Operations at the Gateway International Port of Entry (POE) in Brownsville, Texas. CBP Officers (CBPOs) detained Martha Ramirez Lopez (hereafter RAMIREZ), a United States Citizen, while attempting to enter the U.S. with approximately 4.17 kilograms of cocaine concealed within the passenger side quarter panel of the vehicle RAMIREZ was driving.
2. During primary inbound inspection, CBPOs obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00 from RAMIREZ. CBPOs referred RAMIREZ and the vehicle to secondary inspection for an intensive examination due to a computer-generated alert.
3. During secondary inspection, CBPOs conducted a non-intrusive X-Ray inspection and discovered anomalies located within the passenger side quarter panel of the vehicle RAMIREZ was driving. CBPOs conducted a canine open-air sniff search that yielded a positive alert on the vehicle.
4. A physical search of the vehicle revealed a total of 4 packages concealed within the passenger side quarter panel. CBPOs field tested the substances inside the packages, with a presumptive positive result for the characteristics of cocaine. CBPOs weighed the packages containing suspected cocaine, which weighed approximately 4.17 kilograms on a calibrated scale.
5. HSI Special Agents responded to the Brownsville POE to assist in the investigation. HSI Special Agents interviewed RAMIREZ, who admitted to smuggling narcotics from Mexico to the United States. RAMIREZ stated she was being paid \$250 USD per kilogram of cocaine transported from Mexico into the United States from an unknown person in Mexico. RAMIREZ explained she would meet unknown persons and drop off the cocaine in bags at different locations. RAMIREZ provided HSI Special Agents the location of where the cocaine found in her vehicle was destined to.
6. HSI Special Agents and Task Force Officers conducted a controlled delivery of the cocaine to the parking lot of the H-E-B on Boca Chica Boulevard in Brownsville, Texas, where Rose Etienne Ortiz (hereafter ORTIZ) arrived and took possession of the bag containing the cocaine bricks. ORTIZ was subsequently arrested and admitted to being paid \$50 USD per kilogram of cocaine by an unknown person for picking up the cocaine and transporting it within the

United States. ORTIZ provided HSI Special Agents the location of where the bag of cocaine bricks was destined for after ORTIZ took possession of the narcotics.

7. HSI Special Agents and Task Force Officers conducted a controlled delivery of the cocaine to the parking lot of the Dollar General on Sam Perl Boulevard in Brownsville, Texas, where Brandon Vicente Delgado Puente (hereafter DELGADO) arrived and took possession of the bag containing the cocaine bricks. DELGADO was subsequently arrested and admitted that he was going to be paid an unknown amount of USD by an unknown person for picking up the cocaine for further distribution.